

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
TERRE HAUTE DIVISION**

TRANSGUARD INSURANCE COMPANY)	
OF AMERICA, INC., as Subrogee of)	
C.W. Baker Logistics, Inc.,)	
Carey Wayne Baker, Ian Windom and CRST)	
Specialized Transportation, Inc.,)	
)	
Plaintiff,)	
)	
v.)	No. 2:23-cv-00016-JMS-MJD
)	
LUX HOLDINGS, LLC and)	
EMMANUEL RAMOS,)	
)	
Defendants.)	
<hr style="width: 40%; margin-left: 0;"/>		
)	
DIEDRA BAKER, Personal Representative)	
Of the Estate of Carey Wayne Baker, and)	
IAN WINDOM,)	
)	
Consolidated)	
Plaintiffs,)	
)	
vs.)	
)	
EMMANUEL RAMOS, LUX HOLDINGS,)	
LLC, TRANSGUARD INSURANCE)	
COMPANY OF AMERICA, INC., and)	
ACE AMERICAN INSURANCE CO.,)	
)	
Consolidated)	
Defendants)	

STIPULATION OF PARTIAL DISMISSAL WITH PREJUDICE

Plaintiff, Transguard Insurance Company of America, Inc. as Subrogee of C.W. Baker Logistics, Inc., Carey Wayne Baker, Ian Windom and CRST Specialized Transportation, Inc. (“Plaintiff”), Consolidated Plaintiffs, Diedra Baker, as Personal Representative of the Estate of Carey Wayne Baker and Ian Windom (collectively “Consolidated Plaintiffs”), and Defendants,

Emmanuel Ramos, Lux Holdings, LLC, Transguard Insurance Company of America, Inc. and ACE American Insurance Company, by their respective counsel, pursuant to Rule 41(a)(1)(A) of the Federal Rules of Civil Procedure, hereby stipulate to the dismissal, with prejudice, of Consolidated Plaintiffs' claims against Defendant, ACE American Insurance Company, only, with each party bearing its own costs and expenses, including but not limited to attorney's fees. This cause shall remain pending as to all other claims and parties.

Respectfully submitted,

HOVDE DASSOW + DEEETS, LLC

Respectfully submitted,

FROST BROWN TODD LLP

/s/ Nicholas C. Deets (w/permission)

Nicholas C. Deets, #17293-53
10201 North Illinois Street, Suite 500
Indianapolis, Indiana 46290
T: (317) 818-3100
E: ndeets@hovdelaw.com
*Attorney for Plaintiffs Diedra Baker
as Personal Representative of the
Estate of Carey Wayne Baker and
Ian Windom*

/s/ Todd D. Small

Robert B. Thornburg, #19594-02
Todd D. Small, #28783-49
111 Monument Circle, Suite 4500
PO Box 44961
Indianapolis, Indiana 46244
T: (317) 237-3800
E: rthornburg@fbtlaw.com
tsmall@fbtlaw.com
*Attorneys for Defendant ACE American
Insurance Company*

Respectfully submitted,

LEWIS WAGNER, LLP

/s/ Richard K. Shoultz (w/permission)

Richard K. Shoultz, #155558-73

John J. DeRoss, # 34563-49

1411 Roosevelt Avenue, Suite 102

Indianapolis, Indiana 46201

T: (317) 237-0500

E: rshoultz@lewiswagner.com

jdeross@lewiswagner.com

*Attorneys for Defendants Emmanuel
Ramos and Lux Holdings, LLC*

Respectfully submitted

JOHNSON & BELL, P.C.

/s/ Kyle J. Farris (w/permission)

Edward W. Hearn, # 18691-64

Kyle J. Farris, # 35820-64

11041 Broadway

Crown Point, Indiana 46307

T: (219) 791-1900

E: farrisk@jbltd.com

hearne@jbltd.com

*Attorneys for Defendant Transguard
Insurance Company of America, Inc.*

Respectfully submitted,

KOLB CLARE & ARNOLD, PSC

/s/ Linda H. Clare (w/permission)

Linda H. Clare, #27534-22

9400 Williamsburg Plaza, Suite 200

Louisville, Kentucky 40222

T: (502) 614-4086

E: lclare@kcalegal.com

*Attorney for Plaintiff, Transguard
Insurance Company of America, Inc.
as Subrogee of C.W. Baker Logistics, Inc., Carey
Wayne Baker, Ian Windom and CRST
Specialized Transportation, Inc.*